

2011 DEC 16 A 8: 25

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Action No. 1:11cv1360

Fairfax County Circuit Court
No. 2011-16352

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No. 2011-16352

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. §§ 1441 and 1446,

1. On November 17, 2011, Plaintiff Noah Nathan filed an action encaptioned *Nathan v. Takeda Pharmaceuticals America, Inc. and Takeda Pharmaceuticals North America, Inc.* in the Circuit Court of Fairfax County, Virginia, Case Number 2011-16352. Copies of the summons and complaint are attached as Exhibit 1.

3. Other than a summons and complaint, no other pleadings, process or orders have been served in the state court action. Thus, with this Notice of Removal, counsel certifies that Defendants have filed a copy of all process, pleadings, and orders served upon the Defendants in the state court action.

4. TPA is a wholly-owned subsidiary of Takeda Pharmaceuticals North America, Inc. ("TPNA"). In addition to TPA, plaintiff has also named TPNA as a defendant. TPNA has not been served with a summons and complaint. TPNA joins in and consents to removal of this action and TPNA's joinder and consent is attached as Exhibit 2.

5. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) because the Complaint alleges a violation of and the state court action arises under Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, 42 U.S.C. §§ 2000(e) et seq. See Complaint, ¶¶ 1, 9, 130-135.

5. Venue is proper in this District under 28 U.S.C. §§ 1441(a) and 1446(a) because this is the federal judicial district embracing the Circuit Court of Fairfax County.

6. This Notice of Removal is timely because it was filed within thirty (30) days after Defendants were served with the Complaint. See 28 U.S.C. § 1446(b).

7. Accordingly, this action may be removed pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441(b).

8. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being filed with the Circuit Court of Fairfax County and is being served on all other parties to this action.

Dated: 16 December 2011

Respectfully submitted,



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(Application *pro hac vice* to be submitted)

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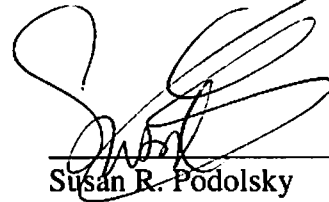
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal was served on December 16, 2011 via email and U.S. mail on:

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